

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA GOEDINGHAUS,	§	
	§	
Plaintiffs,	§	Case No. 5:23-cv-00580-FB
	§	
v.	§	
	§	
TRAMMELL S. CROW, JR., <i>et al.</i>	§	Judge: Hon. Fred Biery
Defendants.	§	Date Action Filed: May 8, 2023 (transferred)
	§	
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**SCEDULING RECOMMENDATIONS**

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The parties recommend that the following deadlines be entered in the scheduling order to control the course of this case:

1. The parties shall complete ADR in compliance with Local Rule CV-88 by 60 days before the date initially set for trial. A motion objecting to ADR must be filed no later than 60 days before that deadline.
2. The Plaintiffs shall submit a separate written offer of settlement to each Defendant by March 13, 2024, and each opposing party shall respond, in writing, by April 12, 2024.
3. Plaintiffs shall file all motions to amend or supplement pleadings or to join additional parties by February 20, 2024 and Defendants shall do so by March 20, 2024.
4. Plaintiffs shall file their designation of testifying experts and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26 by 90 days before discovery deadline. Parties resisting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26 by 45 days

before discovery deadline. All designations of rebuttal experts shall be designated within 30 days of receipt of the report of the opposing expert.

5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within 30 days of receipt of the written report of the expert's proposed testimony, or within 60 days of the expert's deposition, if a deposition is taken, whichever is later.

6. The parties shall complete all discovery on or before April 4, 2025. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.

7. All dispositive motions shall be filed no later than 60 days after the discovery deadline. Dispositive motions and responses to dispositive motions shall be limited to 30 pages in length.

8. The trial date will be determined at a later date by the Court. The parties shall consult Local Rule CV-16 regarding matters to be filed in advance of trial. At the time the trial date is set, the Court will also set the deadline for the filing of matters in advance of trial.

9. All of the parties who have appeared in the action conferred as required by the federal rules of procedure concerning the contents of the proposed scheduling order between January 5 and February 2, 2024, and the parties have agreed as to its contents.

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DATED: February 2, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing “SCHEDULING RECOMMENDATIONS” was served on all counsel of record via ECF on February 2, 2024.

  
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Kyle Foltyn-Smith